

ADANTE D. POINTER, ESQ., SBN 236229
PATRICK BUELNA, ESQ., SBN 317043
POINTER & BUELNA, LLP
LAWYERS FOR THE PEOPLE
155 Filbert Street, Suite 208,
Oakland, CA 94607
Tel: 510-929-5400
Email: APointer@LawyersFTP.com
Email: PBuelna@LawyersFTP.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GERARDO RODRIGUEZ PACHECO, et al.)	Case No.: 2:20-cv-01404-TLN-KJN
)	
Plaintiffs,)	STIPULATION AND ORDER TO
)	EXTEND FACT DISCOVERY
v.)	DEADLINES
)	
CITY OF STOCKTON, et al.)	
)	
.)	
)	
)	
)	
)	
)	
)	

IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiff and Defendants by and through their designated counsel, that:

WHEREAS, the parties have taken several depositions and worked diligently together to complete all outstanding discovery.

WHEREAS, due to limitation of counsels' schedules the parties will require an additional thirty days to complete their non-expert depositions.

//

WHEREAS, the current case schedule is the following:

- a) Non-expert Discovery Cutoff: April 1, 2022
- b) Expert Witness Disclosures: May 23, 2022
- c) Rebuttal Expert Witness Disclosures: July 11, 2022
- d) Expert Discovery Cutoff: September 5, 2022
- e) Dispositive Motion Deadline: November 7, 2022

WHEREAS, the parties respectfully stipulate and jointly request the Court to set the following discovery deadline changes:

- a) Non-expert Discovery Cutoff: May 6, 2022
- b) Expert Witness Disclosures: June 23, 2022
- c) Rebuttal Expert Witness Disclosures: August 23, 2022
- d) Expert Discovery Cutoff: October 5, 2022
- e) Dispositive Motion Deadline: December 7, 2022

IT IS SO AGREED.

Dated: April 6, 2022

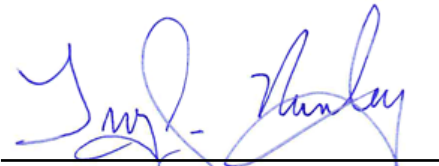
/s/Patrick M. Buelna
PATRICK M. BUELNA
Attorneys for Plaintiff

Dated: April 6, 2022

/s/Sophia M. Retchless
SOPHIA RETCHLESS
Attorneys for Defendants

1 **IT IS SO ORDERED.**

2 Dated: April 7, 2022

3 
4 _____
5 Troy L. Nunley
6 United States District Judge
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25